

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

BLUE SPIKE, LLC,	:	
	:	
Plaintiff,	:	C.A. No. 6:12-cv-499-LED
	:	(LEAD CASE)
v.	:	
	:	<b>JURY TRIAL DEMANDED</b>
TEXAS INSTRUMENTS, INC. et al.	:	
	:	
Defendant.	:	
	:	
BLUE SPIKE, LLC,	:	
	:	C.A. No. 6:13-cv-00088
Plaintiff,	:	
	:	<b>JURY TRIAL DEMANDED</b>
IRIS ID SYSTEMS, INC.,	:	
	:	
Defendant.	:	

**DECLARATION OF MOON HAN**

I, Moon Han, make the following declaration based on my personal knowledge, conversations with knowledgeable employees of Iris ID Systems, Inc. ("Iris ID"), and review of business records.

1. I am currently employed as Vice President of Operations for Iris ID.
2. Iris ID is incorporated in New Jersey and maintains its principal place of business in Cedar Brook Corp Center, 7 Clarke Drive, Cranbury, New Jersey 08512, where I am employed. Iris ID also has facilities in Korea.
3. Iris ID employs approximately 19 employees in its Cranbury, New Jersey office.
4. Based on the allegations in the Complaint, I understand that Blue Spike LLC accuses the following Iris ID products of infringement: IrisAccess systems including iCAM iris

recognition camera devices, iData software including, INSiDE, and IrisAccelerator (collectively, “Accused Products”).

5. The engineering, design, and development of the Accused Products takes place in Iris ID’s Cranbury, New Jersey office. Manufacturing of the Accused Products occurs in Korea.

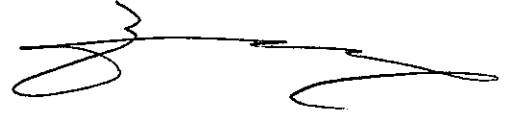
6. Eight of Iris ID’s U.S.-based employees are involved in design, development, engineering, and testing of the software used in the Accused Products. Those employees include: Seh Hwan Jung, Chief Research Engineer, Moon K Choi, Chief Design Officer, James Ewin, Senior Application SW Engineer. Five of Iris ID’s U.S.-based employees work in sales of the Accused Products. Those employees include: Mohammed Murad, VP of Business Development, Tim Myerhoff, Director of North America, Bryan Alexander, Manager Inhouse Sales. All but one of Iris ID’s U.S.-based employees with knowledge about the technical aspects of the Accused Products are based out of Iris ID’s Cranbury, New Jersey office. The remaining U.S.-based Iris ID employee, Tom DeWinter, Natonal Account Sales Manager, is involved in sales of the Accused Products and lives in Boston, Massachusetts, but works out of Iris ID’s Cranbury, New Jersey office on a regular basis.

7. Iris ID also maintains its technical, sales, and marketing documents as well as software related and relevant to the Accused Products in Iris ID’s Cranbury, New Jersey office.

8. Iris ID does not have any employees or maintain any relevant documents in Texas.

9. Iris ID obtained a license to the underlying software and code used in the Accused Products from Iridian Technologies, Inc. (“Iridian”). Based on current information and belief, Iridian was acquired by L-1 Identity Solutions, Inc. (“L-1”), which is now part of the Safran Group along with MorphoTrust USA, Inc. (“MorphoTrust”).

I declare under penalty of perjury that the forgoing statements are based upon my personal knowledge or reasonable and diligent search of documents and discussions with employees and are true and correct.

A handwritten signature in black ink, appearing to read 'Moon Han', written over a horizontal line.

Moon Han